

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**BRANDON CLINT RUSSELL,**

**Defendant**

\* \* \* \* \*

**CRIMINAL NO. JKB-23-056**

**DISPUTED PROPOSED VOIR DIRE AND FINAL JURY INSTRUCTIONS**

The parties respectfully write to inform the Court of disputed proposed voir dire and final jury instructions. They are listed below.

With regard to proposed voir dire, the government objects to the inclusion of questions 16 through 19. The government believes the questions are adequately covered, in substance, in question 42.

With regard to the proposed final jury instructions, the defense objects to the inclusion of the word “advised” in the last paragraph of instruction 34.

Respectfully submitted,  
Erek L. Barron  
United States Attorney

By:                     /s/                      
Kathleen O. Gavin  
Michael F. Aubin  
Assistant United States Attorneys

Cc: Ian Goldstein, Esq., and Kobie Flowers, Esq., Counsel for Defendant Brandon Clint Russell